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6 Attorneys for Defendant Operation  
Underground Railroad, Inc.

The Honorable Benjamin H. Settle

8 UNITED STATES DISTRICT COURT  
9 FOR THE WESTERN DISTRICT OF WASHINGTON  
Tacoma Division

10 QUENTIN M. PARKER and KATHERINE R.  
11 PARKER, husband and wife and the marital  
community thereof,

12 Plaintiffs,

13 v.

14 THE STATE OF WASHINGTON;  
15 WASHINGTON STATE PATROL; CARLOS  
16 RODRIGUEZ, in his individual and official  
17 and official capacities; KRISTI POHL, in her individual  
18 and official capacities; DARRELL NOYES, in  
19 his individual and official capacities; TRAVIS  
20 CALTON, in his individual and official  
21 capacities; MAURICE RINCON, in his  
22 individual and official capacities; WILLIAM  
23 STEEN, in his individual and official  
24 capacities; JAMES TAYLOR, in his individual  
25 and official capacities; CITY OF OLYMPIA, a  
26 municipality; AARON FICEK, in his  
individual and official capacities;  
OPERATION UNDERGROUND  
RAILROAD, INC., a foreign non-profit  
corporation; THURSTON COUNTY, a  
municipality and subdivision of the State of  
Washington; SHAWN HORLACHER, a  
former Thurston County Deputy Prosecutor, in  
his individual and official capacities; JOHN  
DOE AND JANE JOE 1-10, et al.,

Defendants.

Case No. 3:21-cv-05258-BHS

OFFER OF JUDGMENT BY  
DEFENDANT OPERATION  
UNDERGROUND RAILROAD, INC.

OFFER OF JUDGMENT BY O.U.R.  
CASE NO. 3:21-CV-05258-BHS

Snell & Wilmer  
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1  
2 Without in any way admitting liability, and solely in order to avoid further expense and  
3 inconvenience, defendant Operation Underground Railroad, Inc. hereby offers, pursuant to Rule  
4 68 of the Federal Rules of Civil Procedure, that judgment be entered as follows:

5 Judgment in favor of plaintiffs Quentin M. Parker and Katherine R.  
6 Parker, as well as their marital community, against defendant  
7 Operation Underground Railroad, Inc., in the total sum of \$100,000,  
8 which includes all court costs and reasonable attorney fees incurred  
9 by Plaintiffs to the date of this offer. Such judgment is of no claim-  
10 preclusive or issue-preclusive effect, and Operation Underground  
11 Railroad, Inc. denies any wrongdoing of any kind.

12 By accepting this offer and allowing the foregoing judgment to be entered, Plaintiffs  
13 stipulate that they waive the right to sue any current officer, director or employee of Operation  
14 Underground Railroad, Inc. based on any purported act or omission committed in the course and  
15 scope of employment. This stipulation is separate and apart from the foregoing offered judgment.  
16

17 Dated: May 6, 2021

SNELL & WILMER L.L.P.

18  
19 By: s/ Clifford S. Davidson

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22 Attorneys for Defendant  
23 Operation Underground Railroad, Inc.  
24  
25  
26

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2021, I caused to be served a full and exact copy of the foregoing **OFFER OF JUDGMENT BY DEFENDANT OPERATION UNDERGROUND RAILROAD, INC.** on the following:

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by the following indicated method(s):

- ☐ First Class Mail, postage prepaid, deposited in the US mail at Portland, OR
- ☐ Hand delivery
- ☐ Facsimile transmission
- ☐ Overnight delivery
- ☒ Email, pursuant to the parties' electronic service agreement
- ☐ Electronic filing notification

Dated: May 6, 2021

s/ Clifford S. Davidson

Clifford S. Davidson, WSBA 48313